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JUL 13 2010	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY:	DEPUTY

1 DANIEL G. BOGDEN  
 2 United States Attorney  
 3 BRIAN PUGH  
 Assistant United States Attorneys  
 333 Las Vegas Blvd. South, Suite 5000  
 Las Vegas, Nevada 89101  
 4 (702) 388-6336

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6 **UNITED STATES DISTRICT COURT**  
 7 **DISTRICT OF NEVADA**

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9

10 UNITED STATES OF AMERICA, ) CRIMINAL INFORMATION  
 11 Plaintiff, ) CASE NO.: 2:10-cr-00267-GMN-RJJ  
 12 VS. ) VIOLATIONS:  
 13 DENOLE CHRISTIE, ) 18 U.S.C. § 1349 - Conspiracy to Commit Mail  
 a/k/a PHIL MURPHY, ) Fraud, Wire Fraud, and Bank Fraud  
 14 Defendant. )  
 15 )  
 16 )

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17 THE UNITED STATES ATTORNEY FOR THE DISTRICT OF NEVADA CHARGES THAT:

18

19 **COUNT ONE**  
 20 **Conspiracy to Commit, Mail Fraud, Wire Fraud, and Bank Fraud**

21 1. From in or about October 2006, to in or about May 2007, in the State and Federal  
 District of Nevada and elsewhere,

22 **DENOLE CHRISTIE,**

23 defendant herein, did knowingly and willfully combine, conspire, and agree with others known and  
 24 unknown to the grand jury:

25 a. To devise a scheme and artifice to defraud and for obtaining money and  
 26 property by means of false and fraudulent pretenses, representations, and promises, and for the

1 purpose of executing the scheme and artifice, and attempting to do so, did cause to be used  
2 commercial interstate carriers to send and deliver mortgage loan applications, other supporting  
3 documentation, and financial instruments for purposes of executing a scheme and artifice to defraud  
4 and for obtaining money and property by means of false and fraudulent pretenses, representations, and  
5 promises, in violation of Title 18, United States Code, Section 1341;

6 b. To devise a scheme and artifice to defraud and for obtaining money and  
7 property by means of false and fraudulent pretenses, representations, and promises, and for the  
8 purpose of executing the scheme and artifice, and attempting to do so, did cause to be transmitted by  
9 means of wire communications in interstate commerce, funds, for purposes of executing the scheme  
10 and artifice to defraud and for obtaining money and property by means of false and fraudulent  
11 pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1343;  
12 and

13 c. To devise a scheme and artifice to defraud and to obtain money and property  
14 under the custody and control of federally-insured financial institutions, by means of false and  
15 fraudulent pretenses, representations and promises that would cause a bank to part with money or  
16 property, in violation of Title 18, United States Code, Section 1344.

17 The Objectives of the Conspiracy

18 2. The object of the conspiracy and scheme was to obtain money and property by  
19 causing false information regarding straw buyers' employment, income, assets, rental history, and  
20 intent to occupy the property as a primary residence to be placed in the straw buyers' loan applications  
21 and supporting documentation to obtain mortgage loans from federally-insured financial institutions.  
22 Through these transactions, defendant's coconspirators obtained money and property from financial  
23 institutions.

24 Manner and Means

25 3. The manner and means by which the objectives of the conspiracy were accomplished  
26 include, but were not limited to, the following:

1                   a.     Defendant's coconspirators solicited persons to act as straw buyers to purchase  
2 real estate.

3                   b.     Defendant's coconspirators submitted loan applications to financial  
4 institutions, some of which were federally-insured, to fund the straw real estate purchases.

5                   c.     Defendant's coconspirators placed on the straw buyers' loan applications and  
6 supporting documentation, materially false and fraudulent information regarding the straw buyer's  
7 employment, income, assets, rental history, and intention to occupy the property as their primary  
8 residence.

9                   d.     Defendant provided false and fraudulent verifications of rent when defendant  
10 then and there well knew that the verifications of rent were false and fraudulent.

11                  e.     Defendants submitted and caused to be submitted by U.S. Mail and  
12 commercial interstate couriers false and fraudulent loan applications and supporting documentation  
13 to financial institutions to induce the institutions to lend money to fund mortgage loans.

14                  f.     Defendants caused financial institutions to transmit money through  
15 commercial interstate couriers and interstate wire communications to payoff prior mortgage loans and  
16 to fund new mortgage loans.

17                  4.     Defendant committed and caused to be committed overt acts which include, but are  
18 not limited to, the following: On or about December 13, 2006, defendant knowingly provided a false  
19 and fraudulent verification of rent to support a fraudulent loan application to fund the straw purchase  
20 of 8209 Mount Logan Court, Las Vegas, Nevada .

21                  5.     As a result of this fraudulent transaction, the lender suffered a loss of approximately  
22 \$355,000.00.

23                   All in violation of Title 18, United States Code, Section 1349.

**FORFEITURE ALLEGATION ONE**

**Conspiracy to Commit, Mail Fraud, Wire Fraud, and Bank Fraud**

1. The allegation contained in Count One of this Criminal Information is hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the felony offense charged in Count One of this Criminal Information,

DENOLE CHRISTIE,

defendant herein, shall forfeit to the United States of America any property which constitutes, or is derived from, proceeds traceable to violations of Title 18, United States Code, Section 1344 or Title 18, United States Code, Section 1349, a conspiracy to commit such offenses for an *in personam* criminal forfeiture money judgment up to \$7,200.00 in United States Currency.

3. If any property subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant-

- a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;
  - c. has been placed beyond the jurisdiction of the court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property that cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c); and Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendant for the *in personam* criminal forfeiture money judgment up to \$7,200.00 in United States Currency.

1 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States  
2 Code, Section 2461(c); Title 18, United States Code, Sections 1344 and 1349; and Title 21, United  
3 States Code, Section 853(p).

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5 **FORFEITURE ALLEGATION TWO**  
6 **Conspiracy to Commit, Mail Fraud, Wire Fraud, and Bank Fraud**

7 1. The allegation contained in Count One of this Criminal Information is hereby  
8 realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to the  
9 provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code,  
Section 2461(c).

10 2. Upon conviction of the felony offense charged in Count One of this Criminal  
11 Information,

12 **DENOLE CHRISTIE,**

13 defendant herein, shall forfeit to the United States of America any property which constitutes, or is  
14 derived from, proceeds traceable to violations of Title 18, United States Code, Sections 1341, 1343,  
15 and 1344, specified unlawful activities as defined in Title 18, United States Code, Sections  
16 1956(c)(7)(A) and 1961(1)(B), or Title 18, United States Code, Section 1349, a conspiracy to commit  
17 such offenses for an *in personam* criminal forfeiture money judgment up to \$7,200.00 in United States  
18 Currency.

19 3. If any property subject to forfeiture pursuant to Title 18, United States Code, Section  
20 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result of any act or omission of  
21 the defendant-

- 22 a. cannot be located upon the exercise of due diligence;  
23 b. has been transferred or sold to, or deposited with, a third party;  
24 c. has been placed beyond the jurisdiction of the court;  
25 d. has been substantially diminished in value; or

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e. has been commingled with other property that cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c); and Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendant for the *in personam* criminal forfeiture money judgment up to \$7,200.00 in United States Currency.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c); Title 18, United States Code, Sections 1341, 1343, and 1344, specified unlawful activities as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B); Title 18, United States Code, Section 1349; and Title 21, United States Code, Section 853(p).

**FORFEITURE ALLEGATION THREE**

**Conspiracy to Commit, Mail Fraud, Wire Fraud, and Bank Fraud**

1. The allegation contained in Count One of this Criminal Information is hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to the provision of Title 18, United States Code, Section 982(a)(2)(A).

2. Upon conviction of the felony offense charged in Count One of this Criminal Information,

## **DENOLE CHRISTIE,**

defendant herein, shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained directly or indirectly in violations of Title 18, United States Code, Sections 1341, 1343, 1344, and 1349, a conspiracy to commit such offense, pursuant to Title 18, United States Code, Section 982(a)(2)(A), for an *in personam* criminal forfeiture money judgment up to \$7,200.00 in United States Currency.

3. If any property subject to forfeiture pursuant to Title 18, United States Code, Section 982(a)(2)(A), as a result of any act or omission of the defendant-

a. cannot be located upon the exercise of due diligence;

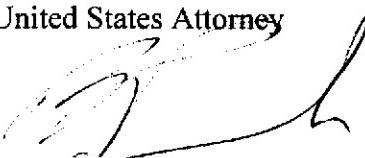
- 1           b.     has been transferred or sold to, or deposited with, a third party;
- 2           c.     has been placed beyond the jurisdiction of the court;
- 3           d.     has been substantially diminished in value; or
- 4           e.     has been commingled with other property that cannot be divided without  
5                 difficulty;

6           it is the intent of the United States of America, pursuant to Title 18, United States Code, Section  
7           982(a)(2)(A) and Title 21, United States Code, Section 853(p), to seek forfeiture of properties of the  
8           defendant for the *in personam* criminal forfeiture money judgment up to \$7,200.00 in United States  
9           Currency.

10           All pursuant to Title 18, United States Code, Sections 982(a)(2)(A), 1341, 1343, 1344, and  
11           1349; and Title 21, United States Code, Section 853(p).

12  
13           DATED: this 10<sup>th</sup> day of June 2010.

14           DANIEL G. BOGDEN  
15           United States Attorney



16  
17           BRIAN PUGH  
18           Assistant United States Attorney

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